

TO: **DAMIAN WILLIAMS, ESQ.**
United States Attorney
Southern District of New York
One. St. Andrew's Plaza
New York, New York 10007
Attn: **ASHLEY NICOLAS, ESQ.**
Assistant United States Attorney

NOTICE OF PRETRIAL MOTIONS

STEVEN PEREZ (hereinafter “Mr. Lucha”), through undersigned counsel, respectfully moves this Court for an order dismissing the indictment against him. As set forth in Mr. Lucha’s accompanying Memorandum of Law, the indictment was obtained in violation of his Second Amendment rights.

Moreover, Mr. Lucha moves to suppress the firearm seized by police on June 23, 2021, along with his cellphone and post-arrest statements to law enforcement because they were obtained through a violation of his Fourth Amendment rights. In the alternative, the Court should hold an evidentiary hearing.

Dated: New York, New York
February 3, 2023